WESTON SOLUTIONS, INC., REGION I START SITE HEALTH AND SAFETY PLAN (HASP)

Prepared by: Colin Cardin **W.O. No.:** 20114-091-998-0912-00

Modified by: George Mavris

Project Identification: Contract No. EP-W-05-042 TDD NO: 13-09-0009 EPA Contact: Mia Pasquerella

Site Name: Turkey Brook Site Address: 20 McLennan Drive, Oakville, Connecticut

Site History: The Turkey Brook Oil Site (the site) is located at 20 McLennan Drive, Oakville, Connecticut. The geographic coordinates, as measured from the approximate center of the site are 41° 35′ 54.01" north latitude and 73° 04′ 32.00" west longitude. The site building is occupied by Quality Automatics, an active automotive parts manufacturing business. The business is operating on the property as a tenant. The site is bordered by Turkey Brook and various industrial properties to the west, by McLennan Drive to the north, by industrial properties to the east, and by residential properties to the south. Turkey Brook is a navigable waterway which flows south into Steele Brook. Steele Brook flows to the southeast and enters the Naugatuck River. Due to various oil releases at the Quality Automatics facility over time, a layer of oil exists on top of the groundwater underneath the facility, causing oil to seep out of the banks and into Turkey Brook.

On 31 August 2012, a sheen was observed in Turkey Brook, in an area located between Quality Automatics to the east and Rintec Corporation to the west, and reported to the Connecticut Department of Energy & Environmental Protection (CT DEEP). CT DEEP responded to the scene to gather more information and investigate the potential source of the spill. Upon arrival at the scene, the CT DEEP deployed absorbent boom to mitigate further impact from the spill. The CT DEEP responder and the CT DEEP Site Assessment and Support Unit performed a subsurface investigation to determine the source of the oil released. They were able to confirm that the oil released was coming from oil floating on top of the groundwater which was migrating from underneath the building occupied by Quality Automatics at 20 McLennan Drive. Following the subsurface investigation, CT DEEP met with the owner of the business and toured the facility to observe on-site operations. While observing the operations at the facility, a 55gallon drum was knocked over by an employee. The employees promptly cleaned up the spill by sweeping the oil into a corner of the building, then applying speedi-dry. The CT DEEP representative expressed concern regarding their clean up procedures and investigated the area where the oil and oily debris were stored. The CT DEEP representative noticed a gap between the floor and the wall which would provide a pathway for the oil to migrate into the soil and onto the groundwater. It was determined that this clean up procedure had been in place for a length of time and that the amount of oil that had been released over time was unknown. The operations and oil storage in the area appeared to be contributing to the problem via a cracked oil hose that was leaking product onto the floor in this same area. The owner of Quality Automatics assumed responsibility for the release and agreed to implement clean up and remediation actions with CT DEEP providing agency oversight.

On 9 October 2012, the potentially responsible party (PRP) contacted the CT DEEP and notified them that they were financially unable to continue clean up actions at the site. CT DEEP responded to the site and noticed a visible sheen on the water. CT DEEP called the National Response Center to report the incident and assumed control of the response. They proceeded to deploy booms and conduct clean up actions. Clean up actions consisted of continual replacement of absorbent boom in three locations on Turkey Brook and the installation of an oil recovery system. The oil recovery system includes two wells with an oil sensor and a pump which pumps oil off of the surface of the groundwater when the sensor is triggered. This system collected approximately 250 gallons of oil which is currently being stored in a secure location on site in 55 gallon drums.

On 25 July 2013, CT DEEP requested assistance from the U.S. Environmental Protection Agency (EPA) with the source removal actions implemented at the site. EPA and CT DEEP personnel conducted a site walk on 21 August 2013 and observed a sheen on the water that was being contained by absorbent booms. The absorbent booms in two of the three deployment areas was completely saturated and potentially contributing to the current sheen. The water level of Turkey Brook was observed to be low, providing a conduit for additional oil to be released from the banks of the brook. EPA and CT DEEP personnel met with the tenant and property owner, and the owner and tenant provided verbal confirmation to allow EPA to assume responsibility of the clean-up actions due to a lack of funds and resources from both the PRP and the CT DEEP. On 22 August 2013, the OSC initiated an emergency action to remediate the visible sheen on Turkey Brook and to prevent further oil from migrating and contaminating areas downstream from the site. Emergency response actions will be initiated by the OSC due to the substantial threat of a discharge from the saturated absorbent boom and the oil sheen on the water. The activities will consist of mobilizing appropriate personnel, equipment, utilities, and supplies; removing oil-contaminated booms from Turkey Brook and replacing them with clean absorbent booms; removing any visible oil sheen from Turkey Brook using appropriate absorbent material; storing any oil or oily debris collected in appropriate containers on site in a secure location; marking containers for identification and disposal; and ensuring that the stored drums are secure and do not continue to pose a substantial threat of a discharge to Turkey Brook

An on-site reconnaissance was conducted by Weston Solutions, Inc., Superfund Technical Assessment and Response Team (START) on 10 October 2013. Currently, there is no system in place to separate and collect the oil from the groundwater. Twenty-one 55-gallon drums containing used oil booms are staged on site. One boom was in place on Turkey Brook near the point where the release of oil occurred and another was placed downstream near the road. No oil or sheen was noted behind the boom near the release, however, a prominent sheen was observed behind the second boom. On-site operations (machine shop) at the facility will be moved from the current location at 20 McLellan Drive to the facility located across the street (south) at 15 McLellan Drive.

A second on-site reconnaissance was conducted by START, EPA, ERRS, CT DEEP Contractor on 25 October 2013. Six relatively new booms were observed and a sheen was noted upstream of some of the booms in Turkey Brook along the northern side of McLellan Drive. A prominent sheen was also noted in the water on the south side of McLellan Road where the surface water in Turkey Brook flowed against the concrete wall along the property line of the QAI facility located at 15 McLellan Road. The team entered the machine shop and back room where the oil spill occurred to observe potential boring locations. A maximum reading of 107 ppm was recorded for VOCs on the MultiRAE. The team proceeded outside to the area of the monitoring wells along the northwestern section of the property. An oil/water interface probe was used to measure the depth to water and oil product thickness in three of the monitoring wells. Depth to water in the southernmost 4-inch monitoring well 10.26 feet below the top of the PVC casing and a product thickness of 0.04 feet was measured. Product thickness increased going northward to the second 4-inch monitoring well (0.99 feet) to the 2-inch monitoring well (4.26 feet) near the concrete pad in front of the back door. Headspace readings in these wells ranged from 3 – 10 ppm.

Scope of Work: (describe briefly, attach site map including work zones Figure 1)

- Task 1: Conduct an on-site reconnaissance (Completed).
- Task 2: Conduct brush clearing.
- Task 3: Collect surface and subsurface soil samples using hand augers, a coring machine, and a pneumatic hammer (inside of the building), and classify soil and collect soil samples.
- Task 4: Collect surface and subsurface soil samples using a Geoprobe and pneumatic hammer (outside of buildings), and classify soil and collect soil samples.

Directions to Site: See Attached

Review and Approval Documentation:

Reviewed by:
Date:

Site Leader/Environmental Compliance Officer
Date:

Approved by:
Date:

Verbal Approval (Emergency Response/Modifications)

Approval by:
Date:

Vehicle Use Assessment and Selection:		
Driving is one of the most hazardous and authorized for use on this project is/are:	frequent activities for Weston Employees.	The most appropriate type of vehicle(s)
☐ Ford F-250 Super Crew Cab Pick-Up T	ruck	
Ford F-350 Geoprobe (Extended Cab)		
Ford E-250 Econoline Van		
Freightliner Box Truck		
Other/Rental (List): sedan		
	fications and experience in driving these type o employee name). All Region I START III raper Crew Cab Pick-Up Truck.	
1. George Mavris		
2. Eric Ackerman		
3. Colin Cardin		
4. Ken Robinson		
roadways, during morning and evening rush Some of commute may be in darkness, and	te to site will be approximately 146 miles of hours. START will acquire local lodging for roadways may be slippery from rain and leav illegal in the State of Connecticut to use hand	or site work lasting longer than one day. es. Drivers should not text while driving
On-Site: Parking is likely to be in the paved	area of the facility. Cones will be used to den	narcate parking areas.
The project site was evaluated and a Traffic	Control Plan 🔲 Is Required 🔀 Is Not Red	quired.
If Required, the Traffic control Plan can be f	ound in Appendix E of this HASP	
Hazard Assessment and Equipment Select	ion	
beginning work, the field safety Officer (FSC protective equipment selection outlined with Safety Officer Manual Section 2, Personal Palso the Environmental Compliance Officer of the State of the Environmental Compliance Officer of the State of the Sta	otective Equipment Program and 29 CFR 1910 (2) and/or the Site Leader have evaluated condition this HASP is appropriate for the hazards knotection Program, for guidance. For Region 1 anless otherwise noted. Signature:	tions and verified that the personal own or expected to exist - Refer to
☐ Dangerous Goods Shipping Coordinator	(If Required):	
Project start date: October 2013 Anticipated Site Visit date: 11/18 /13 End date: 12/31/13	Plan expiration date: 12/31/13	Amendments:



SIT If box is marked a hazard evaluation form/secti		ZARD EVALUATION eted.				
□ CHEMICAL HAZARDS BIOLOGI	CAL HAZARDS	□ PHYSICAL HAZARDS RADIATION □ RADIATION □ RADIATION □ PHYSICAL HAZARDS □ PHYSICAL HAZARDS □ PHYSICAL HAZARDS □ PHYSICAL HAZARDS □ P	ON HAZARDS			
HEALTH AND	SAFETY EVAL	UATION - CHEMICAL HAZARDS				
<u>Chemical Contaminants of Concern – See Appe</u>	endix A for data sh	neets				
Chemical Name/Matrix Total Petroleum Hydrocarbons (Extended Diesel Range Organics - EDRO) in soil	Chemical Name Total Petroleum Hydrocarbons (EDRO) in groundwater	Concentration 1,272,000 μg/L				
reagent type chemicals, solutions, or other identified mater. Ensure that all subcontractors and other parties working ne	als that in normal use in arby are informed of the	aterials used or on-site and attach Material Safety Data Sheet in performing tasks related to this project could produce haza e presence of these chemicals and the location of the MSDS on-site and identify location of the MSDSs here. List chemicals	rdous substances. S. Obtain from			
Chemical Name	Quantity	Chemical Name	Quantity			
Pentane: calibration grade Methane: calibration grade Isobutylene: calibration grade Hydrogen: Instrument Fuel Methanol: decon fluid Isopropanol: decon fluid	< 19 L < 100 L < 17 L < 4 cu. ft. < 5 L < 5L	19 L ABC Fire Extinguisher Material 100 L Liqui-Nox 17 L Compressed Air 4 cu. ft. Gasoline/diesel fuel 5 L Hexane: decon fluid				
	TE SPECIFIC H	AZARDOUS SUBSTANCES				
under 29 CFR 1910 or 1926 for additional information. 1910.1001 Asbestos	02 Coal tar pitch volatil 05 [Reserved] 008 bis-Chloromethyl e 11 4-Aminodiphenyl 114 2-Acetylaminofluore	1910.1006 Methyl chloromethyl ether 1910.1009 beta-Naphthylamine 1910.1012 Ethyleneimine	er zene			
IS SAMPLING TO BE CONDUCTED? X	ES NO					
IS SAMPLING SUBSURFACE? YES including sediment sampling; CT, ME, RI, an activities using power or mechanized equipment	d VT require DIG	and NH require DIGSAFE notification for all SAFE/CALL-BEFORE-U-DIG (CBUD) notificing is required for CT, MA, ME, VT, and NH.				
IS DIGSAFE/CBUD NOTIFICATION REQUIRED? SAFE), START ID no. 33168. For CT sites, call CBUD at		r VT, NH, MA, ME, AND RI sites, call DIGSAFE at 1-88 RT ID no. 03733.	8-344-7233 (1-888-DIG-			
DIGSAFE/CBUD VERIFICATION NO: 20134103087 at REVISED DIGSAFE/CBUD VERIFICATION NO: 20134 LOCAL WATER AND SEWER UTILITIES NOTIFIED	4500531 (11/4/13)					
Utility Contacted/Phone No.	Utility On Sit	te? Utility Emergency Phone No./Procedure/N	lotes			
Connecticut Light & Power (CL&P)	onnecticut Light & Power (CL&P) Electrical (800) 286-2000 or (860) 947-2000 (24hrs/7 days per week)					
Yankee Gas Service Company	Gas	(800) 645-7839				
Watertown Water & Sewer	Water & Sew	ver (860) 945-5299				
AT&T (SBC)	Telephone	(800) 274-1368				
MA, ME, AND NH REQUIRE 72-HOUR NOTIFICATION HOLIDAYS). DIGSAFE NOTIFICATION IS VALID FO		REQUIRE 48 HOUR NOTIFICATION (BOTH EXCLUD	ING WEEKENDS AND			

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HEALTH AND SAFETY EVALUATION - BIOLOGICAL HAZARDS OF CONCERN								
☑ Animals, Snakes, Reptiles, Insects, And Poisonous Plants Common To The New England Area Source: ☐ Known ☒ Suspect Route of Exposure: ☐ Inhalation ☐ Ingestion ☒ Contact ☒ Direct Penetration						Biological H Exposure:	Tazards (List): Known Inhalation Contact	Suspect Ingestion Direct
Sewage Task No(s): Source: Known Suspect Route of Exposure: Inhalation Ingestion Contact Direct Penetration Tetanus Vaccination within Past 10 yrs: Yes No (see Note #1 below) Penetration Etiologic Agents (List) Task No(s): Source: Known Suspect Route of Exposure: Inhalation Ingestion Contact Direct Penetration Penetration								Suspect Ingestion
Note: A tetanus in potential for expo								s have frequent
	HEALTH AND	SAFETY I	EVALUATIO	N — RADIA	ATION HA	ZARDS OF	CONCERN	
			NONIONI	ZING RADIAT	ION			
						Monitoring Instrument	NOTE: NONION RADIATION TYI ULTRAVIOLET, RADIO FREQUE MICROWAVE, A	PES INCLUDE INFRARED, NCY,
IONIZING RADIATION								
DAC (μCi/mL)								
Task #	Radionuclide	Major Radiations	Radioactive Half-Life (Years)	D	W	Y	Surface Contamination Limit	Monitoring Instrument

HEALTH AND SAFETY EVALUATION - Physical Hazards of Concern Bolded Titles Are Commonly Relevant To START Operations						
Phy. Haz. Cond.	Physical Hazard	Attach OP	WESTON OP Titles			
Loud Noise	Hearing loss/disruption of communication		Occupational Noise and Hearing Conservation - See Section 7 of the Corporate Environmental Compliance, Health, and Safety Program Manual			
Inclement Weather	Rain/humidity/cold/ice/snow/lightning		FLD02 - Inclement Weather			
Steam Heat Stress	Burns/displaced oxygen/wet working surfaces		FLD03 - Hot Process - Steam, Low Temperature Thermal Treatment Unit, Transportable Incinerator			
Ambient Heat Stress	Heat rash/cramps/exhaustion/heat stroke		FLD05 - Heat Stress Prevention/Monitoring			
Cold Stress	Hypothermia/frostbite		FLD06 - Cold Stress			
Confined Spaces	Falls/burns/drowning/engulfment/electrocution		FLD08 - Confined Space Entry			
Industrial Trucks	Fork Lift Truck Safety	<u> </u>	FLD09 – Powered Industrial Trucks			
Improper Lifting	Back strain/abdomen/arm/leg muscle/joint injury		FLD10 - Manual Lifting/Handling Heavy Objects			
Uneven Surfaces	Vehicle accidents/slips/trips/falls		FLD11 - Rough Terrain and/or ATV Use			
Poor Housekeeping	Slips/trips/falls/punctures/cuts/fires		FLD12 - Housekeeping			
Structural Integrity	Crushing/overhead hazards/compromised floors		FLD13 - Structural Integrity			
Hostile Persons	Bodily injury		FLD14 - Site Security/Violence Free Workplace			
Improper Cylinder Handling	Mechanical injury/fire/explosion/suffocation		FLD16 - Pressure Systems - Compressed Gases			
Water Hazards	Poor visibility/entanglement/drowning/cold stress		FLD17 - Diving			
Water Hazards	Drowning/heat/cold stress/hypothermia/falls		FLD18 - Operation and Use of Boats			
Water Hazards	Drowning/frostbite/hypothermia/falls/electrocution		FLD19 - Working Over Water			
Vehicle Hazards	Struck by vehicle/collision		FLD20 - Traffic			
Explosions	Explosion/fire/thermal burns		FLD21 - Explosives			
Moving Mechanical Parts	Crushing/pinch points/overhead hazards/electrocution		FLD22 - Earth Moving Equipment/Material Handling Equipment			
Moving Mechanical Parts	Overhead hazards/electrocution		FLD23 - Cranes/Rigging/Slings			
Working At Elevation	Overhead hazards/falls/electrocution		FLD24 - Aerial Lifts/Man Lifts			
Working At Elevation	Overhead hazards/falls/electrocution		FLD25 - Working at Elevation/Fall Protection			
Working At Elevation	Overhead hazards/falls/electrocution/slips		FLD26 - Ladders			
Working at elevation	Slips/trips/falls/overhead hazards		FLD27 - Scaffolding			
Trench Cave-In	Crushing/falling/overhead hazards/suffocation		FLD28 - Excavating/Trenching			
Physiochemical	Explosions/fires from oxidizing, flam./corr. material		FLD30 - Hazardous Materials Use/Storage			
Physiochemical	Fire and explosion		FLD31 - Fire Prevention/			
Physiochemical	Fire		FLD32 - Fire Extinguishers Required and Requirements			
Structural Integrity	Overhead/electrocution/slips/trips/falls/fire		FLD33 - Demolition			
Electrical	Electrocution/shock/thermal burns	\boxtimes	FLD34 - Utilities			
Electrical	Electrocution/shock/thermal burns		FLD35 - Electrical Safety			
Burns/Fires	Heat stress/fires/burns		FLD36 - Welding/Cutting/Brazing/Radiography			
Impact/Thermal	Thermal burns/high pressure impaction/heat stress		FLD37 - Pressure Washers/Sandblasting			
Impaction/Electrical	Smashing body parts/pinching/cuts/electrocution	\boxtimes	FLD38 - Hand and Power Tools			
Poor Visibility	Slips/trips/falls		FLD39 - Illumination			
Fire/Explosion	Burns/impaction		FLD40 - Storage Tank Removal/Decommissioning			
Communications	Disruption of communications		FLD41 - Hand and Emergency Signals/Radio Communication			
Energy/Release	Unexpected release of energy		FLD42 - Lockout/Tag-out			

Dialaria III.	Dialogical Harmada et aita		El D40 Biological Harrando
Biological Hazards	Biological Hazards at site	\boxtimes	FLD43 - Biological Hazards
			FLD 43A - Animals
			FLD 43B - Stinging and Biting Insects
			FLD 43C - Molds and Fungi
			FLD 43D - Hazardous Plants
			FLD 43E - Etiologic Agents
Biological Hazards/BBP	Biological Hazards/BBP at site/First Aid Providers		FLD44 - Bloodborne Pathogens Exposure Control Plan – First Aid Providers
Infectious Waste	Infectious Waste at site/BBP/ at site/Infectious Waste		FLD45 – Bloodborne Pathogens Exposure Control Plan – Work With Infectious Waste
Lead Contaminated Sites	Lead poisoning	\boxtimes	FLD46 - Control of Exposure to Lead
Puncture/Cuts	Cuts/ dismemberment/gouges		FLD47 - Clearing, Grubbing and Logging Operations
Not Applicable	Not applicable		FLD48 – Federal, State, Local Regulatory Agency Inspections
Not Applicable	Exposure to hazardous materials/waste	\boxtimes	FLD49 – Safe Storage of Samples
Cadmium	Exposure Control		FLD50 – Cadmium Exposure Control Plan
Process Safety Procedure	Safety Procedure		FLD51 – Process Safety Procedure
Asbestos	Asbestos Exposure		FLD52 – Asbestos Exposure Control Plan
Hexavalent Chromium	Exposure Control Plan		FLD53 – Hexavalent Chromium Exposure Control Plan
Benzene	Exposure Control Plan		FLD54 - Benzene Exposure Control Plan
Hydrofluoric Acid	Exposure control Plan		FLD55 – Working with Hydrofluoric Acid
Moving Mechanical Parts	Crushing/pinch points/overhead hazards/electrocution		FLD56 – Environmental Remediation Drilling Safety Guideline - 2005
Vehicles/Driving	Accidents,/fatigue/cell phone use	\boxtimes	FLD 57 - Motor Vehicle Safety
Improper Material Handling	Back injury/crushing from load shifts/equipment/tools		FLD 58 – Drum Handling Operations
COC Decontamination	COCs/slip,trip, and falls/waste generation/environmental compliance/PPE		FLD59 - Decontamination
Fatigue From long Hours	Employee Fatigue		FLD60 - Employee Duty Schedule/Basic fatigue Management Plan
Gasoline	Exposure Control Plan		FLD61 - Gasoline Contaminant Exposure

Note there is no FLD01, FLD04, FLD07, FLD15, or FLD29

TASK-BY-TASK RISK ASSESSMENT (Complete One Sheet for Each Task) TASK DESCRIPTION Task 01: Conduct Site Reconnaissance (Completed). **EOUIPMENT REOUIRED/USED** (Be specific, e.g., hand tools, heavy equipment, instruments, PPE) PPE: Level D Air Monitoring: PID, CGI/O2, rad meter Equipment: fire extinguisher, first aid kit, camera, logbook. POTENTIAL HAZARDS/RISKS **CHEMICAL** Mazard Present Risk Level: ☐ H ☐ M 🖂 L What Justifies Risk Level? The building contains an automotive parts manufacturing business. The business is operating on the property as a tenant. Elevated levels of Total Petroleum Hydrocarbons (TPH) have been detected in on-site soils and groundwater although areas outside the site are assumed to have lower levels of contamination. Awareness of potential on-site chemicals and their properties, appropriate use of PPE and air monitoring, attention to surroundings, and use of the "Buddy System" will reduce the risk of exposure. PHYSICAL **⋈** Hazard Present Risk Level: **⋈** H **⋈** M **⋈** L What Justifies Risk Level? Physical hazards include slip/trip/fall hazards from uneven terrain, debris, and vegetation. Work may be done in close proximity to roadways, and high-visibility vests should be worn. Awareness of potential hazards, use of the "Buddy System", and careful observation of surroundings will minimize risks. Proper nutrition and hydration are important factors for maintaining physical strength and mental awareness during field work regardless of the season or site conditions. BIOLOGICAL What Justifies Risk Level? Biological hazards common to the New England area may be encountered. Risks will be minimized by awareness, avoidance of potential hazards, and use of appropriate work clothes/PPE. RADIOLOGICAL Mazard Present Risk Level: H M M L What Justifies Risk Level? Site background does not indicate that radiation sources are present. LEVELS OF PROTECTION/JUSTIFICATION Level D required for all on-site activities. All work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard

Operating Procedures: See pages 7 - 8.

TASK-BY-TASK RISK ASSESSMENT (Complete One Sheet for Each Task) TASK DESCRIPTION Task 02: Conduct brush clearing. **EQUIPMENT REQUIRED/USED** (Be specific, e.g., hand tools, heavy equipment, instruments, PPE) PPE: Level D Air Monitoring: PID, CGI/O2, rad meter Equipment: first aid kit (and Technu), camera, logbook, machete, brush axe, loppers POTENTIAL HAZARDS/RISKS **CHEMICAL** Mazard Present Risk Level: ☐ H ☐ M 🖂 L What Justifies Risk Level? The building contains an automotive parts manufacturing business. The business is operating on the property as a tenant. Elevated levels of Total Petroleum Hydrocarbons (TPH) have been detected in on-site soils and groundwater although areas outside the site are assumed to have lower levels of contamination. Awareness of potential on-site chemicals and their properties, appropriate use of PPE and air monitoring, attention to surroundings, and use of the "Buddy System" will reduce the risk of exposure. **PHYSICAL** What Justifies Risk Level? Physical hazards include slip/trip/fall hazards from uneven terrain, debris, and vegetation. Work may be done in close proximity to roadways, and high-visibility vests should be worn. Caution will be used when using any edged tools during vegetation clearing. Awareness of potential hazards, use of the "Buddy System", and careful observation of surroundings will minimize risks. Proper nutrition and hydration are important factors for maintaining physical strength and mental awareness during field work regardless of the season or site conditions. **BIOLOGICAL** Mazard Present Risk Level: H M M L What Justifies Risk Level? Biological hazards common to the New England area may be encountered, but should be minimal given season and site location. Risks will be minimized by awareness, avoidance of potential hazards, and use of appropriate work clothes/PPE. Special awareness will cautioned to avoid contact with poisonous plants (ivy, sumac, and oak) during brush clearing activities. RADIOLOGICAL **⋈** Hazard Present Risk Level: **⋈** H **⋈** M **⋈** L What Justifies Risk Level? Site background does not indicate that radiation sources are present. LEVELS OF PROTECTION/JUSTIFICATION Level D required for all on-site activities. If brush clearing is conducted in heavily vegetated areas, Tyvek and/or ivy block or Technu will be used.

All work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures: See pages 7-8.

TASK-BY-TASK RISK ASSESSMENT (Complete One Sheet for Each Task)

TASK DESCRIPTION

Task 03: Collect surface and subsurface soil samples using hand augers and a pneumatic hammer (inside the facility), and classify soil and collect soil samples.

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EQUIPMENT REQUIRED/USED (Be specific, e.g., hand tools, heavy equipment, instruments, PPE)
PPE: Modified Level C Air Monitoring: PID, CGI/O2
Equipment: fire extinguisher, first aid kit, camera, logbook, pneumatic hammer, generator, and related equipment; scoops, bowls, sample containers, plastic bags, paper towels, decontamination equipment and supplies, and coolers.
POTENTIAL HAZARDS/RISKS
CHEMICAL
What Justifies Risk Level: ☐ H ☐ M ☑ L What Justifies Risk Level? The building contains an automotive parts manufacturing business. The business is operating on the property as a tenant. Elevated levels of Total Petroleum Hydrocarbons (TPH) have been detected in site soils and groundwater although areas outside the site are assumed to have lower levels of contamination. Ambient air readings for VOCs inside the machine shop and adjacent room to the north ranged from 27 - 107 ppm. Awareness of potential on-site chemicals and their properties, appropriate use of PPE and air monitoring, attention to surroundings, and use of the "Buddy System" will reduce the risk of exposure.
PHYSICAL
☐ Hazard Present Risk Level: ☐ H ☐ M ☐ L
What Justifies Risk Level? Physical hazards include slip/trip/fall hazards. Additional hazards include strains associated with hand augering. Proper lifting techniques will be used when moving and operating the coring machine and pneumatic hammer, and generator. Caution will be exercised when filling up the generator with gasoline (waiting until the generator has cooled down sufficiently). Awareness of potential hazards, use of proper PPE and the Buddy System, and careful observation of surroundings will minimize risks. Proper nutrition and hydration are important factors for maintaining physical strength and mental awareness during field work regardless of the season or site conditions.
BIOLOGICAL
⊠ Hazard Present Risk Level: □ H □ M ⊠ L
What Justifies Risk Level? No biological hazards are anticipated while working inside of the building. Risks will be minimized by awareness, avoidance of potential hazards, and use of appropriate work clothes/PPE.
RADIOLOGICAL
⊠ Hazard Present Risk Level: □ H □ M ⊠ L
What Justifies Risk Level? Site background and previous monitoring does not indicate that radiation sources are present.
LEVELS OF PROTECTION/JUSTIFICATION
Modified Level C is required for all indeed substrates sail compling activities to minimize inhelation and contact with

Modified Level C is required for all indoor subsurface soil sampling activities to minimize inhalation and contact with contaminated soils.

All work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures: See pages 7-8.

TASK-BY-TASK RISK ASSESSMENT (Complete One Sheet for Each Task)

TASK DESCRIPTION

Task 04: Collect surface and subsurface soil samples using a Geoprobe and pneumatic hammer (outside of buildings), and classify soil and collect soil samples.

EQUIPMENT REQUIRED/USED (Be specific, e.g., hand tools, heavy equipment, instruments, PPE)
PPE: Modified Level D Air Monitoring: PID, CGI/O2 Equipment: fire extinguisher, first aid kit, camera, logbook, pneumatic hammer, generator, and related equipment; scoops, bowls, sample containers, plastic bags, paper towels, decontamination equipment and supplies, and coolers.
POTENTIAL HAZARDS/RISKS
CHEMICAL
Mazard Present Risk Level: ☐ H ☐ M ☑ L What Justifies Risk Level? The building contains an automotive parts manufacturing business. The business is operating on the property as a tenant. Elevated levels of Total Petroleum Hydrocarbons (TPH) have been detected in site soils and groundwater although areas outside the site are assumed to have lower levels of contamination. Oil sheens have been observed in several areas of Turkey Brook. Awareness of potential on-site chemicals and their properties, appropriate use of PPE and air monitoring, attention to surroundings, and use of the "Buddy System" will reduce the risk of exposure.
PHYSICAL
What Justifies Risk Level? Physical hazards include slip/trip/fall hazards from uneven terrain, debris, and vegetation. Additional hazards include strains associated with operating the Geoprobe and pneumatic hammer. Proper lifting techniques will be used when moving and operating the pneumatic hammer, and generator. Caution will be exercised when filling up the generator with gasoline (waiting until the generator has cooled down sufficiently). Work may be done in close proximity to roadways, and high-visibility vests should be worn. Awareness of potential hazards, use of proper PPE and the Buddy System, and careful observation of surroundings will minimize risks. Proper nutrition and hydration are important factors for maintaining physical strength and mental awareness during field work regardless of the season or site conditions.
BIOLOGICAL
⊠ Hazard Present Risk Level: □ H □ M ⊠ L
What Justifies Risk Level? Biological hazards common to the New England area may be encountered. Risks will be minimized by awareness, avoidance of potential hazards, and use of appropriate work clothes/PPE.
RADIOLOGICAL
⊠ Hazard Present Risk Level: ☐ H ☐ M ⊠ L
What Justifies Risk Level? Site background and previous monitoring does not indicate that radiation sources are present.
LEVELS OF PROTECTION/JUSTIFICATION
M. P.C. 11 1D ' ' 1

Modified Level D is required for all subsurface soil sampling activities to minimize contact with contaminated soils.

All work will be performed in accordance with the provisions of this HASP, OSHA guidelines, and WESTON Standard Operating Procedures: See pages 7 - 8.

PERSONNEL PROTECTION PLAN							
Engineering Controls Describe Engineering Control	ols used as part of Personnel Prot	ection Plan:					
Administrative Controls Describe Administrative con	trols used as part of Personnel Pr	rotection Plan:					
		ersonnel: 40-Hour OSHA Health Monitoring Clearance. FSO: 8-H					
Personal Protective Equipr List Initial PPE Level For E							
Task 01: Level D PPE - See	Page 13 for Action Levels.						
Task 02: Modified Level D I	PPE - See Page 13 for Action Lev	vels.					
	PPE - See Page 13 for Action Lev						
	Description of I	Levels of Protection					
Level D	Level D Modified	Level C	Level B				
Task(s): 01 and 02 ☐ Head - Hard Hat (as appropriate) ☐ Eye (Safety Glasses as appropriate ☐ Hearing - Ear Plugs ☐ Appropriate Uniform ☐ Hand - Gloves - surgical ☐ Foot - Safety Boots ☐ Foot - Over boots	Task(s): 03 ☐ Head - Hard Hat (task 03) ☐ Eye (Safety Glasses) ☐ Hearing - Ear Plugs task 03) ☐ Appropriate Uniform ☐ Coverall (Tyvek) ☐ Hand - Gloves (inner - surgical) ☐ Hand - Gloves ☐ Hand - Gloves (outer - surgical) ☐ Foot - Safety Boots ☐ Foot - Over boots ☐ Other (specify)	Task(s): ☐ Head - Hard Hat ☐ Face (Splash Shield) ☐ Hearing - Ear Plugs ☐ Appropriate Uniform ☐ Coverall (Tyvek) ☐ Hand - Gloves (inner - surgical) ☐ Hand - Gloves (outer - cotton or nitrile) ☐ Foot - Safety Boots ☐ Foot - Over boots ☐ Respirator (Full Face APR) ☐ Cartridge (OV/HEPA) ☐ Other (P-100)	Task(s): Head - Hard Hat Face (Splash Shield) Hearing - Ear Plugs Appropriate Uniform Coverall (Saranex) Hand - Gloves (inner - surgical) Hand - Gloves (middle) Hand - Gloves (outer - nitrile) Foot - Safety Boots SCBA Other (specify)				

SITE OR PROJECT HAZARD MONITORING PROGRAM								
Direct Reading Air Monitoring Instruments								
Instrument Selection and Initial Check Record Reporting Format: ☐ Field Logbook ☐ Field Data Sheets ☐ Air Monitoring Log ☐ Trip Report ☐ Other								
Instrument	Task No.(s)	Instrument Number	Comment	Initials				
⊠ CGI/O ₂	01/03/04							
CGI/O ₂ /H ₂ S/CO								
⊠ RAD								
⊠ Micro-R	01							
☐ GM								
☐ Other								
⊠ PID	01/03/04							
☐ FID								
RAM, Mini-RAM, Other								
☐ Mercury Vapor Analyzer								
Single Gas								
\square H ₂ S								
\square CL ₂								
☐ HCN								
Other								
☐ Pump – Drager								
☐ Tubes/type:								
☐ Tubes/type:								
Other								
Chlorine Meter								
Ammonia Meter								
Personal/Area Sampling								
Asbestos								
☐ Lead								
Other								
Other (List)								

SITE AIR MONITORING PROGRAM

Action Levels

These Action Levels, if not defined by regulation, are some percent (usually 50%) of the applicable PEL/REL/TLV. That number must also be adjusted to account for instrument response factors.

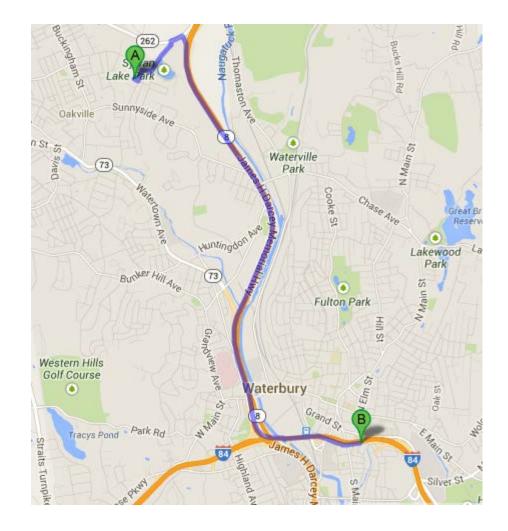
	Tasks	Action Level Ambient Concentration	Action
⊠ Explosive atmosphere	01-04	<10% LEL	Work may continue. Consider toxicity potential.
umosphere		10 to 25% LEL	Work may continue. Increase monitoring frequency.
		>25% LEL	Work must stop. Ventilate area before returning.
⊠ Oxygen	01-04	<19.5% O ₂	Leave Area. Re-enter only with self-contained breathing apparatus.
		19.5% to 25% O2	Work may continue. Investigate changes from 21%.
		>25% O ₂	Work must stop. Ventilate area before returning.
□ Radiation	0-1	< 3 times background	Continue Work.
		3 Times Background to < 1 mR/hour	Possible radiation source(s) present (normal background is 0.01-0.02 mR/hr). Continue investigation with caution. Perform thorough monitoring. Consult with a Health Physicist.
		> 1 mR/hour	Potential radiation hazard. Continue investigation only upon the advice of Health Physicist.
☐ Unknown Organic Gases/Vapors	01-04	< 1 unit above background	Level D, continue air monitoring.
		1 to 5 units above background	Level C, continue air monitoring.
		> 5 to 500 units above background	Level B, continue air monitoring.
		> 500 units above background	Evacuate affected area.

Note: Action levels listed above do not include confined space entry work.

ote. Action levels fisted above do not include confined space citify work.								
	AIR MONITORING/SAMPLING SUMMARY LOG							
	W	ork Location	n Instrumen	t Readings				
PID FID Aerosol Radiation Detector Monitor Meter Tubes (units) (units) (units) (units) (uR/Hour) (PPM)							Other	
Inside Quality Automatics, Inc. Building	0	20.9	27 - 107	NA	NA	8	NA	NA
Perimeter of Quality Automatics, Inc. Building Outside	0	20.9	0	NA	NA	8	NA	NA

	CONTING	ENCIFS		
	Emergency Contacts an			
Agency	Contact	Phone Number		
Local Medical Emergency	St. Mary's Hospital	203-709-6000		
Facility (LMF)	St. Mary's Hospital	200 107 0000		
WESTON Medical Emergency Contact	Dr. Peter Greaney WorkCare	0600 to 1630 hours Pacific Time, M-F dial 0 or extension 175.	: Call 800-455-6155,	
	300 S. Harbor Blvd, Ste 600 Anaheim, CA 92805	1631 to 0559 hours Pacific Time, and Sunday and Holidays: call 800-455-61		
WESTON Health and Safety	William Irwin	610-701-3684		
·		267-918-8371 (ce	ell)	
Fire Department	Watertown Fire Department	860-945-5224 or	911	
Police Department	Watertown Police Department	860-945-5200 or 9	911	
Weston/START Site Leader	Colin Cardin	Office: 978-552-2	115	
		Cell: 978-621-12	02	
EPA Site Coordinator	Mia Pasquerella	Office: 617-918-1	120	
		Cell: 617-312-47	18	
OSHA Hotline		1-800-321-6742		
Chem-Tel		1-800-255-3924		
ATSDR		1-404- 639-0615		
ATF (explosives information)		1-800-800-3855		
Chemtrec		1-800-424-9300		
Poison Control Center		1-800-222-1222	2	
National Response Center		1-800-424-8802		
START Health and Safety Phone	Paul Callahan	1-978- 621-120	3	
	Local Medical Emer	gency Facility(s)		
Name of Hospital: St Mary's	Hospital			
Address: 56 Franklin St. Wate	erbury, CT 06706		Phone No.: 203-709-6000	
Type of Service: ☐ Physical trauma only ☐ Chemical exposure only ☐ Physical trauma and chemical exposure ☐ Available 24 hours	Route to Hospital (written detail):	See attached	Travel time from site: approx. 9 minutes; Distance to hospital: approx. 5.4 miles. Name/No. of 24-hr Ambulance Service: 911	

- 1. Head east on McLennan Drive toward Falls Ave
- 2. Take the 1st left onto Falls Ave
- 3. Turn right onto Sylvan Lake Rd
- 4. Take the 1st left onto Frost Bridge Rd
- 5. Turn right onto CT-262/Frost Bridge Rd
- 6. Turn right to merge onto CT-8 S toward Waterbury
- 7. Take exit 31 on the left to merge onto I-84 E toward Hartford
- 8. Take exit 22 toward Baldwin St/Downtown/Waterbury
- 9. Merge onto McMahan St (Destination will be on the left)



CONTINGENCY					
	Response Pla	ns			
Medical – General Provide First Aid as trained, assess and determine need for further medical assistance. Transport or arrange for transport after decontamination.					
First Aid Kit required: Yes	Type - Standard field including bloodborne pathogen kit	Location - START vehicle	Special First Aid Procedures: Cyanides on site ☐ Yes ☒ No. If yes, contact LMF. Do they have antidote kit? ☐ Yes ☐ No		
Eyewash required Yes No	Type - Standard Gravity-Fed	Location - START vehicle	Hydrogen Fluoride on site Yes No. If yes, need neutralizing ointment for First Aid kit. Contact LMF.		
Spills: In the event of a spill or release, ensure safety, assess situation and perform containment and control measures as appropriate:	 a. If small spill, clean up per MSDS; Notify Emergency Coordinator. b. If large spill, Sound Alarm; Notify Emergency Coordinator. c. Evacuate to pre-determined safe place. d. Account for all personnel. e. Determine if Team can respond safely. 	Spill Response Equipment (Type) None	Location		
Fire/Explosion: In the event of a fire or explosion, ensure personal safety, assess situation and perform containment and control measures as appropriate:	a. Sound Alarm and call assistance, Notify Emergency Coordinator b. Evacuate to predetermined safe place c. Account for personnel d. Use fire extinguisher, only if safe and trained e. Standby to inform Emergency responders of materials and conditions	Fire Extinguisher (Type): 10/20 lb ABC	Location - START vehicle		
	ourban area; however, personnel shounes. Any security concerns should b				

	DECONTAMINATION PLAN					
	Levels of Protection Required for Decontamination Personnel					
The	The levels of protection required for personnel assisting with decontamination will be:					
	Level B	Level C				
Мо	difications include:					
		and Monitoring Equipment Decontami	nation			
Dec	contamination procedure required for	site personnel:				
\boxtimes	Dry decon					
\boxtimes	Wet decon (If Needed)					
	Wash boots and gloves					
	Remove outer boots					
	Remove outer gloves					
	Remove chemical coverall					
	Remove respiratory protection					
	Remove inner gloves					
_		Sampling Equipment Decontamination				
Sar	apling equipment will be decontamina	ated in accordance with the following pro	ocedure:			
\boxtimes	Wash with soap and water					
\boxtimes	Rinse with tap water					
\boxtimes	Rinse with isopropyl alcohol					
	Rinse with hexane					
	Rinse with methanol					
\boxtimes	Rinse with DI water					
\boxtimes	Air dry					
	Disposition of Investigation-Derived Wastes					
app offi	plicable: PPE will be decontaminated ice for disposal in accordance with the	cion including identification of storage and on site as needed, double-bagged, and reast START Region I field-generated waste of on site in accordance with the access a	eturned to the Andover, MA START SOP. Soil cuttings and soap/water			

SITE PERSONNEL				
V	WESTON			
Name: Eric Ackerman Title: Project Leader/Environmental Compliance Officer Task(s): 03/04		Name: Colin Cardin Title: Field Safety Officer Task(s): 03/04		
		✓ Medical Current☐ Fit Test Current (Qual.)	☐ Training Current☐ Fit Test Current (Quant.)	
Name: George Mavris Title: Geologist/Site Leader Task(s): 01 - 04		Name: Ken Robinson Title: Sampler Task(s): 03/04		
		✓ Medical Current☐ Fit Test Current (Qual.)	☐ Training Current☐ Fit Test Current (Quant.)	
TRAINING CURRENT: All personnel, including visitors, entering the exclusion or contamination reduction zones must have current certifications of completion of training in accordance with 29 CFR 1910.120.				
FIT TEST CURRENT: All persons, including visitors, entering any area requiring the use or potential use of any negative pressure respirator must have had, as a minimum, a qualitative fit test, administered in accordance with OSHA 29 CFR 1910.134 or ANSI, within the last 12 months. If site conditions require the use of a full-face, negative-pressure, air-purifying respirator for protection from asbestos or lead, employees must have had a qualitative fit test, administered according to OSHA 29 CFR 1910.1001 or 1025/1926, within the last 6 months.				
MEDICAL CURRENT - Medical Monitoring Requirements: All personnel, including visitors, entering the exclusion or contamination reduction zones must be certified as medically fit to work, and to wear a respirator (if appropriate), in accordance with 29 CFR 1910.120 and 29 CFR 1910.134.				
The Site Field Safety Officer is responsible for verifying all certifications and fit tests.				
SITE SPECIFIC HEALTH AND SAFETY PERSONNEL	ı			
The Field Safety Officer (FSO) for activities to be conduc	ted at this sit	e is: Colin Cardin		
The FSO has total responsibility for ensuring that the provisions of this Site HASP are adequate and implemented in the field.				
Changing field conditions may require decisions to be made concerning adequate protection programs. Therefore, the personnel assigned as FSOs are experienced and meet the additional training requirements specified by OSHA in 29 CFR 1910.120				
⊠ 8 Hour Site Safety Supervisor Training		r Training porne pathogens, and Adult CP ined Space Training	R Training	

HEALTH AND SAFETY PLAN APPROVAL/SIGNOFF FORM Site Name: Turkey Brook Address: 20 McLennan Drive, Watertown, CT I understand, agree to and will conform with the information set forth in this Health and Safety Plan (and attachments) and discussed in the Personnel Health and Safety briefing(s). Signature Date Name

ON-SITE TAILGATE SAFETY MEETING ATTENDANCE LIST (TO BE CONDUCTED DAILY)

DATE: TOPICS COVERED: PPE Levels, Air Monitoring Action Levels, Chemical Hazards, Physical Hazards, Tasks To Be Conducted, Weather Hazards, Other Topics Including:

Name	Signature

ATTACHMENT "A"

CHEMICAL CONTAMINANTS

DATA SHEETS

(Attach appropriate data sheets.)

ATTACHMENT "B"

MATERIAL SAFETY DATA SHEETS (MSDS)

ATTACHMENT "C"

SAFETY PROCEDURES/FIELD OPS

(FLDOP'S) See Accompanying Field OP Binder

ATTACHMENT "D"

SITE SPECIFIC HAZARD COMMUNICATION PROGRAM

Location Specific Hazard Communications Program/Checklist

In order to ensure an understanding of and compliance with the Hazard Communication Standard, WESTON will utilize this checklist/document (or similar document) in conjunction with the WESTON Written Hazard Communications Program as a means of meeting site or location specific requirements.

While responsibility for activities within this document reference the WESTON Safety Officer (SO), it is the responsibility of all personnel to effect compliance. Responsibilities under various conditions can be found within the WESTON Written Hazard Communication Program.

To ensure that information about the dangers of all hazardous chemicals used by WESTON are known by all affected employees, the following hazardous information program has been established. All affected personnel will participate in the hazard communication program. This written program as well as WESTON's Corporate Hazard Communication Program will be available for review by any employee, employee representative, representative of OSHA, NIOSH or any affected employer/employee on a multi-employer site.

 Site or other location name/address: <u>Turkey Brook</u>
 Site/Project/Location Manager:Eric Ackerman
 Site/Location Safety Officer:George Mavris
 List of chemicals and MSDSs complied, format: HASP:_X Other:
Tailgate Safety Meeting conducted by (name and date):

List of Hazardous Chemicals

A list of known hazardous chemicals used by WESTON personnel must be prepared and attached to this document. Further information on each chemical may be obtained by reviewing the appropriate MSDS's. The list will be arranged to enable cross reference with the MSDS file and the label on the container. The SO or location manager is responsible for ensuring the chemical listing remains up-to-date.

Container Labeling

The WESTON Safety Officer (SO) will verify that all containers received from the chemical manufacturer, importer or distributor for use on site will be clearly labeled.

The SO is responsible for assuring labels are placed where required and for comparing MSDS's and other information with label information to ensure correctness.

Material Safety Data Sheets (MSDS)

The SO is responsible for establishing and monitoring WESTON's MSDS program for the location. The SO will make sure procedures are developed to obtain the necessary MSDS's and will review incoming MSDS's for new or significant health and safety information. He/she will see that any new information is passed on to the affected employees. If an MSDS is not received at the time of initial shipment, the SO will call the manufacturer and have a MSDS delivered for that product in accordance with the requirements of WESTON's Written Hazard Communication Program.

A log for, and copies of, MSDS's for all hazardous chemicals in use will be kept in the MSDS folder at a location known to all site workers. MSDS's will be readily available to all employees during each work shift. If an MSDS is not available, immediately contact the WESTON SO or designated alternate. When revised MSDS's are received the SO will immediately replace the old MSDS's.

Employee Training and Information

The SO is responsible for the WESTON site-specific personnel training program. The SO will ensure that all program elements specified below are supplied to all affected employees.

At the time of initial assignment for employees to the work site or whenever a new hazard is introduced into the work area employees will attend a health and safety meeting or briefing that includes the information indicated below.

• Hazardous chemicals present at the worksite

- Physical and health risks of the hazardous chemicals
- The signs and symptoms of overexposure
- Procedures to follow if employees are overexposed to hazardous chemicals
- Location of the MSDS file and written hazard communication program
- How to determine the presence or release of hazardous chemicals in the employees work area
- How to read labels and review MSDS's to obtain hazard information
- Steps WESTON has taken to reduce or prevent exposure to hazardous chemicals
- How to reduce or prevent exposure to hazardous chemicals through use of controls procedures, work practices and personal protective equipment
- Hazardous, non-routine tasks to be performed (if any)
- Chemicals within unlabeled piping (if any)

Hazardous Non-Routine Tasks

When employees are required to perform hazardous non-routine tasks the affected employee(s) will be given information by the SO about the hazardous chemicals he or she may utilize during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use and steps WESTON is using to reduce the hazards. These steps include, but are not limited to, ventilation, respirators, presence of another employee and emergency procedures.

Chemicals in Unlabeled Pipes

Work activities may be performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the SO at which time information as to; the chemical(s) in the pipes, potential hazards of the chemicals or the process involved, and safety precautions which should be taken will be determined and presented.

Multi-Employer Worksites

It is the responsibility of the SO to provide other employers with information about hazardous chemicals imported by WESTON to which their employees may be exposed, along with suggested safety precautions. It is also the responsibility of SO and the site manager to obtain information about hazardous chemicals used by other employers to which WESTON employees may be exposed. WESTON's chemical listing will be made available to other employers as requested. MSDS's will be available for viewing as necessary.

The location, format and/or procedures for accessing MSDS information must be relayed to affected employees.